



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
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RICK SNYDER
GOVERNOR

MICHAEL P. FLANAGAN
STATE SUPERINTENDENT

**FISCAL YEAR 2013
CHILD AND ADULT CARE FOOD PROGRAM
FAMILY DAY CARE HOME SPONSOR MEMORANDUM #23**

TO: Family Day Care Home Sponsors

FROM: Kyle L. Guerrant, Director
Office of School Support Services

DATE: July 26, 2013 - Revised

SUBJECT: Questions and Answers Regarding the Participation of Head Start Programs in Child Nutrition Programs

The purpose of this memorandum is to consolidate United States Department of Agriculture's (USDA) policy regarding the participation of Head Start Programs in the Child Nutrition Programs (CNP). For more information about the Head Start Program and Early Head Start Program, please see the Office of Head Start's website at <http://www.acf.hhs.gov/programs/ohs/>.

This memorandum supersedes the following previously issued memoranda:

- SP 34-2008, CACFP 10-2008, SFSP 09-2008, *Automatic Eligibility for Early Head Start Participants*, August 5, 2008
- SP 23-2008, CACFP 07-2008, SFSP 06-2008, *Automatic Eligibility for Free Meal Benefits Extended to All Children Enrolled in Head Start*, May 16, 2008
- *Automatic Eligibility of State-Funded Pre-Kindergarten Participants for Free Meals in the Child and Adult Care Food Program (CACFP), the National School Lunch Program (NSLP), and the School Breakfast Program (SBP)*, July 22, 1999
- *Automatic Eligibility for Free Meals in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Special Milk Program (SMP) and Child and Adult Care Food Program (CACFP) for Participants in the Head Start Program*, April 14, 1995

Section 336 of the Healthy Hunger-Free Kids Act of 2010 tasked the Secretary with examining and reporting on the feasibility of reducing unnecessary or duplicative paperwork in the Child and Adult Care Food Program (CACFP). In response, the Food and Nutrition Service (FNS) established a Paperwork Reduction Work Group.

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608 WEST ALLEGAN STREET • P.O. BOX 30008 • LANSING, MICHIGAN 48909
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Based on recommendations from this work group, this memorandum is also intended to emphasize the categorical eligibility of the Head Start and Early Head Start participants and to reiterate the legislative intent to serve these populations nutritious meals through the CNPs without undue barriers.

Questions and Answers

1. Do children participating in Head Start or Early Head Start need to complete additional income eligibility forms to qualify for free meals?

Children enrolled in Federal and State-funded Head Start or Early Head Start are categorically eligible to receive free meal benefits without further application or eligibility determination. Categorical eligibility means additional free and reduced price applications and income eligibility forms are not required.

Eligibility determinations for the CNPs are made on an annual basis. As long as the child is enrolled in Head Start or Early Head Start at the time the annual eligibility determination is made, all reimbursable meals served to that child may be claimed at the free rate.

Institutions, sponsors, and school food authorities (SFA) may establish eligibility of all Head Start enrollees through documentation provided by the Head Start program. Forms of acceptable documentation include:

- an approved Head Start application
- a statement of Head Start enrollment
- a list of participants from a Head Start official

2. If a child who is eligible for Head Start benefits also attends a child care center or family day care home, is the child automatically eligible for free CACFP meals at the child care facility without further application or eligibility determination?

Yes. All CACFP reimbursable meals served to children enrolled in Head Start or Early Head Start may be claimed at the free rate by child care centers or Tier 1 rates in day care homes in which they are enrolled.

3. Are the siblings or other children who are members of a Head Start child's household also automatically eligible for free meals without further application?

Only children enrolled in Head Start are categorically eligible. Categorical eligibility based on Head Start enrollment **does not** extend to all children in the same household. See SP 38-2009, CACFP 08-2009, SFSP 07-2009, *Extending Categorical Eligibility to Additional Children in a Household*, August 27, 2009, http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf for more information.

4. Can a day care home document eligibility for Tier 1 reimbursement based on the provider's own child's enrollment in a Head Start program?

Public Law 110-134 extended categorical eligibility only to children enrolled in Head Start. Therefore, a child's Head Start enrollment does not extend to the provider. This supersedes the guidance found in *Questions and Answers #4: Two-tier Reimbursement Structure for Family Day Care Homes Participating in the Child and Adult Care Food Program (CACFP) Tiering Q & A's* May 16, 1997, <http://www.fns.usda.gov/cnd/Care/Regs-Policy/policymemo/1999-1996/1997-5-16.pdf>.

5. Are children who are enrolled in Head Start but who are members of households that are above the Head Start income eligibility requirements still eligible for CACFP meals at the free rate?

Yes. All reimbursable meals served to children enrolled in Head Start may be claimed at the free rate. Head Start serves primarily children from families with household incomes at or below the Federal poverty level. However, a small proportion of children in families with household incomes above the poverty level may also be served.

The Improving Head Start for School Readiness Act of 2007 (Public Law 110-134) amended sections 9(b)(12)(A)(iii) and 17(c)(5) of the Richard B. Russell National School Lunch Act to make any child enrolled in Head Start categorically eligible for free meals without further application or eligibility determination.

6. Are children enrolled in State-funded or Indian Tribal Organization (ITO)-funded pre-kindergarten programs eligible for free meals?

Children are not automatically eligible in Michigan. The Income Eligibility Statements (IES) must be complete.

7. Are Early Head Start participants who are pregnant considered categorically eligible for free meals?

Yes, pregnant participants in Early Head Start and who are otherwise eligible to receive meals through a Child Nutrition Program are categorically eligible for free meals. The improving Head Start for School Readiness Act of 2007 (Public Law 110-134) amended sections 9(b)(12)(A)(iii) and 17(c)(5) of the Richard B. Russell National School Lunch Act to establish such eligibility.

8. Do Head Start centers need to annually verify enrollment, or is the documentation valid for the entire period a child is enrolled in Head Start or Early Head Start?

Documentation of enrollment is required annually for each CACFP participant, including those enrolled in Head Start or Early Head Start.

9. What role does the Community Development Institute (CDI) play in Head Start and CACFP?

CDI is the National Interim Management contractor for the U.S. Department of Health and Human Services Office of Head Start (OHS). OHS has contracted with CDI, a nonprofit corporation headquartered in Denver, Colorado, to provide interim Head Start management services nationwide. See CACFP 14-2007, *National Interim Head Start Grantee Participation in the Child and Adult Care Food Program: Community Development Institute, August 15, 2007*, http://www.fns.usda.gov/cnd/Care/Regs-Policy/policymemo/2007-2009/CACFP_14-2007.pdf for more information.

If you have any additional questions concerning this memorandum, contact CACFP at 517-373-7391 or go to <http://www.fns.usda.gov/cnd/Care/Regs-Policy/PolicyMemoranda.htm> to view the guidance.